

# Exhibit 6

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RICHARD A. WILLIAMSON, ON BEHALF §  
OF AND AS TRUSTEE FOR AT HOME §  
BONDHOLDERS' LIQUIDATING TRUST §  
§ Case No. 11 cv 4948 (LTS) (KNF)  
Plaintiff, §  
§  
vs. §  
§  
VERIZON COMMUNICATIONS INC., et al. §  
§  
Defendants. §

**AT&T DEFENDANTS'  
INITIAL DISCLOSURES**

Defendants AT&T Inc.<sup>1</sup>, AT&T Operations Inc., and AT&T Services, Inc. (collectively, “AT&T”) serve the following initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. These initial disclosures are based on information currently available to AT&T. AT&T reserves the right to supplement these disclosures after further investigation and discovery in accordance with Rule 26(e).

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<sup>1</sup> In accordance with the court’s instructions, AT&T, Inc. hereby responds to these requests subject to and without waiver of its objections with respect to personal jurisdiction, as set forth more fully in AT&T, Inc.’s Motion To Dismiss For Lack Of Personal Jurisdiction (See Dkt. Nos. 44 and 45).

(a) Rule 26(a)(1)(A)(i): “the name the name and, if known, the address and telephone number of each individual likely to have discoverable information - along with the subjects of that information - that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.”

Chris Chase  
9505 Arboretum Blvd.  
6th Floor  
Austin, TX 78759-6337  
Distinguished Member of Technical Staff  
Knowledge of architecture of U-verse network.

Tom McCrady  
6000 Las Colinas Blvd., suite 3052  
Irving, TX 75309  
Director of Network Operations Centers  
Knowledge of planning and releases of U-verse routing and switching.

Alejandro Olea  
6000 Las Colinas Blvd., suite 3071  
Irving, TX 75309  
Director of Video Operations Center - IP Operations  
Knowledge of U-verse IPTV applications.

Peter Lowrie  
9505 Arboretum Blvd., 7W02  
Austin, TX 78759  
Director of New Product Engineering  
Knowledge of testing for U-verse interactive applications (video-on-demand, local access channels, etc.).

Preman Narayanan  
2180 N. Glenville Dr., A43  
Richardson, TX 75082  
Lead Product Marketing Manager  
Knowledge of planning and integration for U-verse TV advertising.

Chet Parker  
208 S. Akard Street, suite 1823  
Dallas, Texas 75202  
Executive Director, Financial Analysis  
Knowledge concerning the finances for U-verse.

The foregoing individuals are employed by AT&T-affiliated entities and may only be contacted through counsel for AT&T, Baker Botts L.L.P., 2001 Ross Avenue, Dallas, Texas 75201, telephone (214) 953-6500.

In addition, AT&T identifies the following individuals and/or entities who may have relevant information:

Milo S. Medin, Jr.

(current address unknown; last known address shown below)  
885 Hillcrest Dr.  
Redwood City, CA 94062

Knowledge concerning the alleged conception and reduction to practice of the inventions claimed in the patents-in-suit, and regarding the preparation and prosecution of the applications that issued as the patents-in-suit. Knowledge concerning the scope and content of the prior art, enforceability, commercial success, laches, licensing, and non-infringing alternatives.

Brian M. Hoffman, Esq. (Reg. No. 39,713)

Fenwick & West LLP  
555 California Street, 12th Floor  
San Francisco, CA 94104  
(415) 875-2484

Knowledge concerning the preparation and prosecution of the applications that issued as the patents-in-suit. Knowledge concerning the scope and content of the prior art, and enforceability.

James K. Okamoto, Esq. (Reg. No. 40,110)

Okamoto & Benedicto, LLP  
1737 North First Street, Suite 270  
San Jose, CA 95112  
(408) 436-2111

Knowledge concerning the preparation and prosecution of the applications that issued as the patents-in-suit. Knowledge concerning the scope and content of the prior art, and enforceability.

Dorian Cartwright, Esq. (Reg. No. 53,853)

2130 The Alameda, Suite 200  
San Jose, CA 95126  
(800) 810-8030

Knowledge concerning the preparation and prosecution of the applications that issued as the patents-in-suit. Knowledge concerning the scope and content of the prior art, and enforceability.

Richard A. Williamson, Esq.  
Flemming Zulack Williamson Zauderer LLP  
One Liberty Plaza  
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Knowledge regarding the preparation and prosecution of the patents-in-suit or one or more applications related to the patents-in-suit.

AT&T reserves the right to supplement this disclosure as investigation and discovery in this lawsuit progress.

**(b) Rule 26(a)(1)(A)(ii): “a copy - or description by category and location - of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.”**

AT&T identifies the following documents by category and location:

1. Documents describing the operation of U-verse are in the offices of AT&T-affiliated entities;
2. Documents pertaining to sales and marketing of U-verse are in the offices of AT&T-affiliated entities; and
3. Documents comprising prior art to the patents-in-suit are in the possession of Baker Botts L.L.P. or AT&T-affiliated entities.

Documents will be produced in accordance with the discovery schedule set by the Court. AT&T reserves the right to supplement these categories as investigation and discovery in this lawsuit progress.

**(c) Rule 26(a)(1)(A)(iii): “a computation of each category of damages claimed by the disclosing party - who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected**

**from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.”**

AT&T seeks costs, expenses, reasonable attorneys' fees, and prejudgment interest under 35 U.S.C. § 285. AT&T reserves the right to allege damages and supplement, modify, or add to this disclosure as discovery progresses.

**(d) Rule 26(a)(1)(A)(iv): “for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.”**

AT&T is not aware of any such agreements.

Date: December 22, 2011      Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ Robert L. Maier, Jr.

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**ATTORNEYS FOR DEFENDANTS**  
**AT&T INC., AT&T SERVICES, INC., AND**  
**AT&T OPERATIONS, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that that on this 22 day of December 2011, a copy of the foregoing **DEFENDANTS AT&T INC., AT&T OPERATIONS, INC., AND AT&T SERVICES, INC.'S INITIAL DISCLOSURES** was served electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Robert L. Maier  
Robert L. Maier